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FCC Mail Room

January 26, 2009

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

Re: Annual CPNI Compliance Certification, EB Docket No. 06-36

Dear Secretary Dortch:

Attached for filing in EB Docket No. 06-36, please find the Annual 47 C.F.R. § 64.2009(e) CPNI Compliance Certificate and accompanying statement of Union Communications.

If there are questions regarding this filing, please contact the undersigned. Thank you for your assistance.

Sincerely,


Jasper C. Thayer
Vice President

JCT:tmm

Enclosure

cc: Federal Communications Commission, Enforcement Bureau (2)
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Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: January 26, 2009

Name of company covered by this certification: Union Telephone Company d/b/a Union
Communications

Form 499 Filer ID: 801576

Name of signatory: Jasper C. Thayer

Title of signatory: Vice President

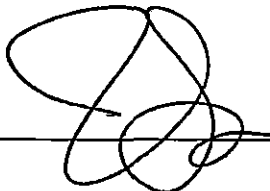
I, Jasper C. Thayer, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission) against data brokers in the past year. The company is not aware of any activity by data brokers or pretexters with respect to its customers' CPNI during the reporting year; the company has no information to report with respect to the processes pretexters are using to attempt to access CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed _____



STATEMENT OF COMPLIANCE WITH CPNI RULES

Union Telephone Company d/b/a Union Communications ("UC") provides local, long distance and data solutions to residential and business customers in Alton, Barnstead, Center Barnstead, New Durham, Gilmanton Iron Works and portions of Strafford and Farmington, New Hampshire.

UC has adopted a policy of providing written CPNI notices to all new customers and existing customers every two years. These notices explain the customers' CPNI rights in accordance with the FCC's CPNI Rules, including their right to restrict the use and disclosure of, and access to their CPNI. These notices also provide information on how customers can opt-out of receiving marketing from UC and its affiliates that is based upon the use of CPNI. Customers are given a minimum of 33-days to opt-out before they are presumed to have consented to use of their CPNI.

From time to time, UC or its affiliates use CPNI to market communications-related services outside of those services to which UC's customers already subscribe but only where the customer has granted approval pursuant to opt-out instructions in the CPNI notices. UC maintains records of these notices for at least one year.

UC has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use or disclosure of that customer's CPNI. Specifically, UC maintains records of which customers respond to the opt-out notice by notating "Yes" or "No" in the marketing field for each customer in UC's customer account database. The customer's approval or disapproval to use, disclose, or permit access to a customer's CPNI obtained by UC remains in effect until the customer revokes or limits such approval or disapproval.

UC may, as permitted by the CPNI rules, use CPNI without customer approval (1) to bill and collect for services rendered; (2) to protect the rights or property of UC, other users or other carriers from unlawful use; (3) to provide customer premises equipment and protocol conversion; (4) to provision inside wiring, maintenance and repair services; and (5) to market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding, and certain Centrex features.

UC does not share, sell, lease or otherwise provide CPNI to any third parties for the purposes of marketing any services. Sharing, selling, leasing or otherwise providing CPNI to any third parties is strictly prohibited by UC.

UC maintains a record for at least one year of its own and affiliates sales and marketing campaigns that use customers' CPNI. UC has established a supervisory review process to ensure any marketing campaigns are consistent with the FCC's CPNI rules. This process includes a periodic review by the Marketing Director and Business Office Department Manager who are responsible for approving any proposed outbound marketing requests that would require customer approval. Additionally, UC supervisors monitor customer calls from time-to-time to assure that customer accounts and information are being accessed properly by the employees and consistent with UC's CPNI policies.

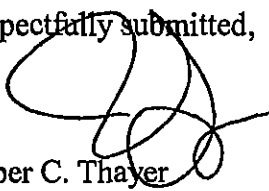
UC has physical security, information technology, and personnel measures in place to discover and protect against attempts to gain unauthorized access to CPNI. Customers are asked to establish a password and provide answers to back-up security questions that do not use readily available biographical information, or account information. Customers who forget their password and cannot provide the answer to their back-up security questions to retrieve their password are required to be re-authenticated to establish a new password and new answers to back-up security questions. Passwords are required prior to disclosure to the customer of call detail information over the telephone. Customers who do not have a password may have UC send call detail and other account information to the customer's service address of record or to an e-mail address that has been associated with the customer's account for at least thirty (30) days. In the event a password, customer answer to a back-up security question, or address of record is created or changed, UC immediately provides notice to the customer at either the pre-existing email address of record, telephone number of record or service address of record. Such notice informs the customer as to the nature of the change, but does not reveal the changed information. Customers requesting CPNI at UC's business location must present a valid photo ID matching the customer's account information. UC does not provide customers with on-line access to customer account information.

All UC employees who have access to CPNI receive training and bi-annual reminders about CPNI compliance. All UC employees are required to sign a Confidentiality Agreement when they are hired. This requires UC employees to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by UC. Employees who violate the Confidentiality Agreement or otherwise permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.

UC has not experienced any CPNI breaches during the reporting year. However, UC has in place procedures to detect breaches and to notify law enforcement and customers, in compliance with the Commission's rules, should a breach occur. In the event of a breach, UC has procedures in place to maintain a record of notifications to law enforcement and customers documenting the date(s) of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach, which record would be kept for a minimum of two years.

UC has in place procedures to ensure that it will provide written notice to the FCC within five business days of any instance where its opt-out mechanisms do not work properly to such a degree that its customers' inability to opt-out is more than an anomaly. These procedures ensure that the notice will be in the form of a letter, and will include: (i) UC's name; (ii) a description of the opt-out mechanism(s) used; (iii) the problem(s) experienced; (iv) the remedy proposed and when it will be or was implemented; (v) whether the relevant state commission(s) has been notified; (vi) whether UC has taken any action; (vii) a copy of the notice provided to customers; and (viii) contact information. UC will submit the above letter even if UC offers other methods by which its customers may opt-out.

Respectfully submitted,



Jasper C. Thayer
Vice President

Union Telephone Company d/b/a Union Communications